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Of Attorneys for Proposed Intervenor-Plaintiff National Alliance on Mental Illness

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH;
PROVIDENCE HEALTH & SERVICES –
OREGON and ST. CHARLES HEALTH
SYSTEM,

Plaintiffs,

v.

SEJAL HATHI, MD, in her official capacity
as Director of Oregon Health Authority,

Defendant.

Case No. 6:22-cv-01460-AN

**DECLARATION OF CHRIS BOUNEFF IN
SUPPORT OF PROPOSED INTERVENOR-
PLAINTIFF NATIONAL ALLIANCE ON
MENTAL ILLNESS' MOTION TO
INTERVENE**

I, Chris Bouneff, declare as follows:

1. I am the Executive Director of NAMI-Oregon. I have been the Executive Director of NAMI-Oregon for over 15 years, and have been active with NAMI-Oregon for several years before I became Executive Director. I make this declaration based on personal knowledge, except where indicated below.

2. NAMI-Oregon is the state chapter of the National Alliance on Mental Illness. It is a grassroots, membership-governed organization. Membership consists almost entirely of individuals living with mental illness, family members supporting a loved one living with mental illness, and parents/caregivers raising school-age youth living with behavioral health issues.

3. NAMI-Oregon's mission is to improve the quality of life for individuals and families living with mental illness through education, support, and advocacy. Its mission is not limited to Portland. Through seventeen local affiliates across Oregon, NAMI-Oregon annually serves 15,000 Oregonians with education classes, support groups, and workshops. NAMI-Oregon annually answers 2,000 phone calls and emails on the NAMI-Oregon Resource Helpline.

4. NAMI-Oregon's advocacy harnesses the lived experience of its members to pursue policy reforms and investments at the state, regional, and local levels. Among NAMI-Oregon's guiding principles are that every Oregonian across their lifespan deserves access to timely, accessible, and effective treatments and supports. NAMI-Oregon believes recovery should be an expectation, not an exception.

5. Because NAMI-Oregon's mission is to support and advocate on behalf of individuals living with mental illness, its membership and constituency includes individuals who are subject to civil commitment orders, and individuals who may become subject to such orders in the future. Examples of NAMI-Oregon's advocacy include passage of a sweeping health insurance parity bill in the 2021 Legislature and legislation in 2023 that will lead to a fully implemented 988

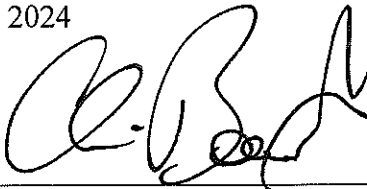
crisis system in Oregon. NAMI-Oregon is currently part of efforts in the legislature to address Oregon's approach to civil commitment.

6. NAMI-Oregon is committed and dedicated to the very individuals who are the subject of this lawsuit. Its membership includes individuals who have been subject to civil commitment orders, and it often assists individuals and family members of individuals who are subject to civil commitment orders. Its voice and experience should be part of any conversation about the impact of OHA's failures, and the efficacy of potential remedies. For those reasons, NAMI-Oregon seeks to intervene in this matter as a Plaintiff in order to assert those claims in the SAC that are made on behalf of individuals who are subject to civil commitment orders.

7. NAMI's ability to fulfill its mission is directly tied to OHA's practices in treating—and not treating—individuals who are civilly committed individuals. Because OHA is violating the constitutional and statutory rights of NAMI-Oregon's members and the individuals that NAMI serves, NAMI must expend significant resources and take on a much larger role in “filling-the-gap” due to the absence of treatment from OHA. NAMI-Oregon's ability to fulfill its mission and effectively assist its members and other individuals who suffer from severe mental illness is thwarted by the violations described in the Plaintiffs' Second Amended Complaint.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

DATED this 17 day of October 2024



Chris Bouneff